

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Michael Jay Berger (SBN 100291) Law Offices of Michael Jay Berger 9454 Wilshire Blvd., 6th Floor Beverly Hills, California 90212 T: (310) 271-6223 F: (310) 271-9805 E: Michael.Berger@bankruptcypower.com	FOR COURT USE ONLY
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Mr. Tortilla, Inc.	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SAN FERNANDO VALLEY DIVISION	
In re: Mr. Tortilla, Inc., <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 1:24-bk-10228-VK CHAPTER: 11 <div style="text-align: center; padding: 10px;"> STATEMENT REGARDING CASH COLLATERAL OR DEBTOR IN POSSESSION FINANCING [FRBP 4001; LBR 4001-2] </div> <div style="padding: 5px;"> DATE: 02/22/2024 TIME: 2:00 p.m. COURTROOM: 301 ADDRESS: 21041 Burbank Blvd. Suite 354 Woodland Hills, CA 91367 </div>

Secured party(ies): U.S. Small Business Administration; Amazon Capital Services, Inc.; Corporation Service Company (as representative); Sand Park Capital LLC; Fasanara Securitisation S.A. [see attached for full list]

The Debtor has requested the approval of either (1) a motion for use of cash collateral, or postpetition financing, or both, or (2) through a separately-filed motion, a stipulation providing for the use of cash collateral, or postpetition financing, or both. The proposed form of order on the motion or the stipulation contains the following provisions or findings of fact:

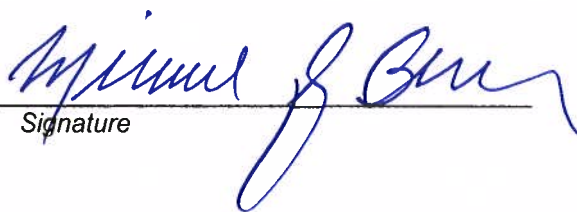
Disclosures Tracking FRBP 4001(c)(1)(B)(i) through (xi) and (d)(1)(B)	Page No.:	Line No. (if applicable)
<input type="checkbox"/> (i): "[A] grant of priority or a lien on property of the estate under § 364(c) or (d)"		
<input checked="" type="checkbox"/> (ii): "[T]he providing of adequate protection or priority for a claim that arose before the commencement of the case, including the granting of a lien on property of the estate to secure the claim, or the use of property of the estate or credit obtained under § 364 to make cash payments on account of the claim"	7	6-17
<input type="checkbox"/> Cross-collateralization, <i>i.e.</i> , clauses that secure prepetition debt by postpetition assets in which the secured party would not otherwise have a security interest by virtue of its prepetition security agreement or applicable law	9	19-28
<input type="checkbox"/> Roll-up, <i>i.e.</i> , provisions deeming prepetition debt to be postpetition debt or using postpetition loans from a prepetition secured party to pay part or all of that secured party's prepetition debt, other than as provided in § 552(b)		

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

<i>Continued from page 1</i>			
<input type="checkbox"/>	Grant a replacement lien in an amount in excess of the dollar amount of the lien on cash collateral as of the petition date		
<input type="checkbox"/>	(iii): "[A] determination of the validity, enforceability, priority, or amount of a claim that arose before the commencement of the case, or of any lien securing the claim"		
<input type="checkbox"/>	(iv): "[A] waiver or modification of Code provisions or applicable rules relating to the automatic stay"		
<input type="checkbox"/>	Automatic relief from the automatic stay upon occurrence of certain events.		
<input type="checkbox"/>	(v): "[A] waiver or modification of any entity's authority or right to file a plan, seek an extension of time in which the debtor has the exclusive right to file a plan, request the use of cash collateral under § 363(c), or request authority to obtain credit under § 364"		
<input type="checkbox"/>	(vi): "[T]he establishment of deadlines for filing a plan of reorganization, for approval of a disclosure statement, for a hearing on confirmation, or for entry of a confirmation order"		
<input type="checkbox"/>	(vii): "[A] waiver or modification of the applicability of nonbankruptcy law relating to the perfection of a lien on property of the estate, or on the foreclosure or other enforcement of the lien"		
<input type="checkbox"/>	(viii): "[A] release, waiver, or limitation on any claim or other cause of action belonging to the estate or the trustee, including any modification of the statute of limitations or other deadline to commence an action"		
<input type="checkbox"/>	(ix): "[T]he indemnification of any entity"		
<input type="checkbox"/>	(x): "[A] release, waiver, or limitation of any right under § 506(c)"		
<input type="checkbox"/>	The granting of any lien on any claim or cause of action arising under § 506(c)		
<input type="checkbox"/>	(xi): "The granting of any lien on any claim or cause of action arising under §§ 544, 545, 547, 548, 549, 553(b), 723(a), or 724(a)"		
Additional Disclosures Required by LBR 4001-2		Page No.:	Line No. (if applicable)
<input type="checkbox"/>	With respect to a professional fee carve out, disparate treatment for professionals retained by a creditors' committee from that provided for the professionals retained by the debtor		
<input type="checkbox"/>	Pay down prepetition principal owed to a creditor		
<input type="checkbox"/>	Findings of fact on matters extraneous to the approval process		

02/20/2024
Date

Michael Jay Berger
Printed Name


Signature

ATTACHMENT TO STATEMENT REGARDING CASH COLLATERAL

In re: Mr. Tortilla, Inc. – Case No. 1:24-bk-10228-VK

The Secured Parties:

1. U.S. Small Business Administration, UCC no. 20-7779943462, filed May 20, 2020.
2. Amazon Capital Services, Inc., UCC no. U210083315624, filed September 8, 2021.
3. Corporation Service Company (as representative), UCC no. U220179776030, filed March 30, 2022
4. Corporation Service Company (as representative), UCC no. U220213901220, filed July 27, 2022.
5. Sand Park Capital LLC, UCC no. U220219238027, filed August 16, 2022.
6. Fasanara Securitisation S.A., UCC no. U220228375230, filed September 20, 2022.
7. 8Fig, Inc., UCC no. U220251441725, filed December 14, 2022.
8. Huntington Valley Bank, UCC no. U220255076422, filed December 28, 2022.
9. First Corporate Solutions (as representative), UCC no. U230007398433, filed January 31, 2023.
10. Partners Personnel Management Services, LLC, UCC no. U230017096122, filed March 13, 2023.
11. Metropolitan Capital Bank & Trust, UCC no. U230024532824, filed April 7, 2023.
12. Stor RB One Limited, UCC no. U230077163329, filed October 27, 2023.
13. Parkside Funding Group LLC, UCC no. U230017096122, filed January 16, 2024.
14. CT Corporation Service Company (as representative), UCC no. U240005322926, filed January 23, 2024.
15. Cedar Advance, date unknown.
16. Shopify Capital, date unknown.
17. Sellers Funding, date unknown.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
9454 Wilshire Blvd., 6th Fl., Beverly Hills, CA 90212

A true and correct copy of the foregoing document entitled (*specify*): **STATEMENT REGARDING CASH COLLATERAL OR DEBTOR IN POSSESSION FINANCING** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 2/20/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Debtor's Proposed Counsel: Michael Jay Berger michael.berger@bankruptcypower.com,
yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforruptcy.com
U.S. Trustee: Katherine Bunker kate.bunker@usdoj.gov
United States Trustee (SV) ustregion16.wh.ecf@usdoj.gov

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 2/20/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Honorable Victoria Kaufman
United States Bankruptcy Court
Central District of California
21041 Burbank Boulevard, Suite 354 / Courtroom 301
Woodland Hills, CA 91367 United States Bankruptcy Court

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2/20/2024

Date

Yathida Nipha

Printed Name

Signature

3. Served by Email:

U.S. Trustee:
Katherine Bunker
kate.bunker@usdoj.gov

SECURED CREDITORS:

8FIG Advance
Attn: Legal Dept.
legal@8fig.com

Amazon Capital Services:
Attn: Lauren Dorsett & Michael Gearin
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mike.gearin@klgates.com

Blue Bridge Financial
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Bluevine
Attn: Officer
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Corporation Service Company
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First Corporate Resolution
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Huntington Valley Bank
Attn: Erin
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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Mercury Capital
info@mcadv.com

Metropolitan Capital Bank & Trust
Attn: Jeffrey Brown
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Parkside Funding Group LLC
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Partners Personnel Management Services, LLC
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Robert Reiser and Company
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Sand Park Capital
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Sellers Funding
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Shopify Capital
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Slope Advance
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Spartan Capital
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Stor RB One Limited
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U.S. Business Administration
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20 LARGEST UNSECURED CREDITORS

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Greenberg Traurig
Attn: Reid Hockaday
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